

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE**

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IAN LUCAS, :  
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Plaintiff, :  
 :  
 : Case No. 3:24-cv-00440  
 :  
v. :  
 : Judge Waverly Crenshaw  
 :  
VANDERBILT UNIVERSITY, :  
 : Magistrate Judge Frensley  
Defendant. :  
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**MOTION FOR COURT ORDER TO ESTABLISH CONFIDENTIALITY AND  
PREVENT UNAUTHORIZED ACCESS TO STUDENT EDUCATION RECORDS**

COMES NOW, the Plaintiff, Ian H. Lucas, by and through his undersigned counsel, and respectfully requests this Honorable Court to issue an order directing Vanderbilt University to place a confidentiality flag on Plaintiff's student education records, to seal and retain all data related to the former student's email [ian.h.lucas.1@vanderbilt.edu](mailto:ian.h.lucas.1@vanderbilt.edu) and any data that has been altered, erased, or changed in any way since access was taken from the Plaintiff. The Plaintiff further requests that such data logs be remanded to him for review and potential use in legal proceedings. In support of this motion, the Plaintiff states as follows:

***Request for Confidentiality Flag:***

- Plaintiff requests that a confidentiality flag be placed on his student education record at Vanderbilt University.
- This request is made to prevent the unauthorized release or alteration of any and all information regarding any records of any kind pertaining to Plaintiff's time as a student at

Vanderbilt University. Such records, in any and all types and forms at the University, should be restricted from access by any and all persons, staff, faculty, and or individuals. Any inquiries or requests for access should be directed to the Plaintiff and to the court, except for Plaintiff himself or as required by law, specifically in accordance with the Family Educational Rights and Privacy Act of 1974 (FERPA) or as amended and ordered through the court. Should any access occur to the Plaintiff's records for any reason, the Plaintiff should be immediately notified with a detailed explanation for the purpose and reason of access, an itemized list of what was accessed, and the names, titles, and reasons for access of the authorizing staff members.

**3. *Effective Date and Duration:***

- Plaintiff understands that this action is effective immediately upon the issuance of the court order and can only be removed or altered upon written request by the Plaintiff or by further order of the court.

**4. *Legal Basis:***

- FERPA provides that educational institutions must protect the privacy of student education records and allows for certain privacy settings to be requested by the student.

- Plaintiff seeks this court order to ensure that his educational records remain confidential and to protect his privacy rights under FERPA.


**5. *Attached Documentation:***

- A copy of the Plaintiff's signed Confidentiality Request dated June 14, 2024, is attached hereto as Exhibit A for the Court's reference.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant this Motion and issue an order directing Vanderbilt University to place a confidentiality

flag on Plaintiff's student education records as outlined above, and for such other and further relief as the Court deems just and proper.

Dated: June 15th, 2024

By: \_\_\_\_\_

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*Plaintiff Pro Se*

### PROOF OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION was served by CE/ECF on this 15th day of JUNE 2024 on all counsel or parties of record.

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Ian H. Lucas, Pro Se